

November 24, 2020

VIA ECF

Hon. George B. Daniels  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

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Re: *Grubbs, et al. v. Brown, et al.*, Case No. 1:92-cv-02132 (GBD) – Request to (1) adjourn the conference scheduled for December 1, 2020; and (2) extend the litigation stay and approve the Stipulation and Proposed Order

Dear Judge Daniels,

We write on behalf of Plaintiffs in the above-titled case to request that the Court adjourn the conference scheduled December 1, 2020. (ECF No. 242) Counsel for all parties consent to this request. If it is convenient for the Court, we request that the conference be rescheduled to the morning of December 15, 2020.

We also request that the Court approve the attached Stipulation and Proposed Order. Counsel for all parties consent to this request and have signed the attached Stipulation and Proposed Order. The Stipulation and Proposed Order extends the current litigation stay (ECF No. 241) by two weeks from December 1 to December 15, 2020, and continues to suspend the March 30, 2020 discovery and briefing schedule (ECF No. 220). This is the seventh request for an extension of the litigation stay, since the parties notified the Court on April 28, 2020 (ECF No. 221) that they have reached a settlement in principle.

Our requests are required in order to resolve pending issues so that the parties can finalize documentation of our settlement.

Respectfully Submitted,

/s/ Colin T. West

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